

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE FOREIGN EXCHANGE BENCHMARK
RATES ANTITRUST LITIGATION

No. 1:13-cv-07789-LGS

**PROPOSED ORDER GRANTING MOTION FOR ISSUANCE OF A
HAGUE CONVENTION REQUEST FOR INTERNATIONAL
JUDICIAL ASSISTANCE TO TAKE TESTIMONY OVERSEAS**

The Court, having reviewed Plaintiffs' Motion for Issuance of a Hague Convention Request for International Judicial Assistance to Take Testimony Overseas as well as the papers in support and opposition, HEREBY ORDERS THAT:

1. The Motion is GRANTED.
2. The Request for International Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matter attached as Exhibit A to the Declaration of Christopher M. Burke, dated October 26, 2020, is hereby issued as the Court's "Letter of Request" and is fully incorporated herein.
3. The signed Order and the Letter of Request will be given to Scott+Scott Attorneys at Law LLP, Co-Lead Class Counsel for Plaintiffs, who will cause both documents to be filed with The Senior Master (Queen's Bench Division), Royal Courts of Justice Strand, London WC2A 2LL, England.
4. The Stipulation and Order of Confidentiality ([ECF No. 555](#)) in this action shall apply to the deposition, including the transcript and video.

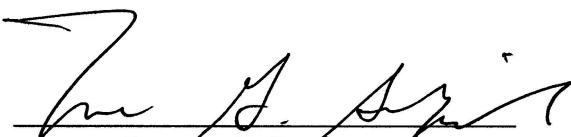
5. This Order, the deposition of Ms. Carly Hosler, or the terms of the Letter of Request (which are incorporated into this Order) shall not be construed or operate as a waiver of any argument, position, objection, allegation, or claim or defense of any party in the above-captioned action, or of the attorney-client privilege, the work product doctrine, or any other privileges, rights, protections, or prohibitions that may apply to that evidence under the laws of England, the United States, or the State of New York.

6. The parties will be subject to all safety guidance issued by this Court and the courts of the United Kingdom with regard to the COVID-19 pandemic in order to ensure that the deposition will proceed in a safe manner for the deponent, counsel, and other personnel.

The Clerk of Court is respectfully directed to close the motion at Docket No. 1527.

So Ordered.

Dated: November 6, 2020
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE